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BUTCH TONGATE
Cabinet Secretary

JUAN CARLOS BORREGO
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

October 28, 2016

Mr. Brent Westmoreland
Utilities Director
CRRUA Sunland Park
P.O. Box 429
Sunland Park, New Mexico 88063

Re: Major Municipal; SIC 4952; Compliance Evaluation Inspection; CRRUA Sunland Park Wastewater Treatment Plant; NPDES Permit No. NM0029483; September 29, 2016

Dear Mr. Westmoreland:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
NPDES Industrial & Municipal Section
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Sarah Holcomb
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

CRRUA Sunland Park
October 28, 2016
Page 2

If you have any questions about this inspection report, please contact Barbara Cooney at (505) 827-0212 or at barbara.cooney@state.nm.us.

Sincerely,

/S/ Sarah Holcomb

Sarah Holcomb
Acting Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ-PP) by e-mail
Gladys Gooden- Jackson, USEPA (6EN-WC) by e-mail
NMED District 3, Michael Kesler, Manager by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 2 9 4 8 3 11 12 1 6 0 9 2 9 17 18 C 19 S 20 1					
Remarks					
M A J O R M U N I C I P A L C R R U A S U N L A N D					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 3	71 N	72 N	73	74 75 M A J O R 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063 Dona Ana County	Entry Time /Date 10:04 Hours / September 29, 2016	Permit Effective Date May 1, 2015
	Exit Time/Date 16:25 Hours / September 29, 2016	Permit Expiration Date April 30, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Carlos Arellano, Lead Operator 915-238-8740 (cell) & 575-589-1075 Fax 575-525-6199 Mr. Brent Westmoreland, Utility Director 575-649-9349 Mr. Eric Lopez, Contractor 575-644-8665	Other Facility Data SIC CODE 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Brent Westmoreland, Utility Director, CRRUA 575-649-9349 fax 575-526-6199 Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063	Outfall at Rio Grande River Coordinates in Decimal Degrees Latitude: N31.79866 Longitude: W106.55733	
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	U	Flow Measurement	M	Operations & Maintenance	U	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE THE FURTHER EXPLANATIONS SECTIONS OF THE ATTACHED REPORT

Name(s) and Signature(s) of Inspector(s) /S/ BARBARA COONEY	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date 10-28-2016
Signature of Management QA Reviewer /S/ JENNIFER FOOTE	Agency/Office/Phone and Fax Numbers 505-827-0187 / 505-827-0160	Date 10-28-2016

Introduction

On September 29, 2016 a Compliance Evaluation Inspection (CEI) was conducted at the Camino Real Regional Utility Authority (CRRUA) Sunland Park Wastewater Treatment Plant (WWTP) by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by USEPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the CRRUA representatives (the permittee), observations made by the NMED inspectors, reports and records kept by the permittee and/or NMED.

The CRRUA - Sunland Park WWTP is classified as a major municipal discharger under the Federal Clean Water Act (CWA), section 402 NPDES permit program, and is assigned NPDES permit number NM0020483. The Standard Industrial Classification Code (SIC) is 4952. The facility is permitted for a design flow of 2.0 Million Gallons per Day (MGD). The discharge for the WWTP enters The Rio Grande in Water Quality Segment 20.6.4.101 NMAC at Latitude N 31.79866, Longitude W 106.55733 in decimal degrees. The Designated Uses for this segment of the river are: irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and primary contact.

Inspection Details

The inspector arrived at the CRRUA Sunland Park WWTP at 10:04 hours and met with, Mr. Carlos Arellano, Lead Operator; Mr. Brent Westmoreland, Utility Director; Mr. Eric Lopez, Contractor; and Mr. Carlos Guebara, Contractor. The inspector showed her credentials and explained the purpose of the inspection. The group accompanied the inspector on a tour of the facility; three lift stations in the collection system; The Sunland Park North (old Santa Teresa Plant); and the onsite laboratory. A records review was conducted following the facility tour. The inspector left the CRRUA facilities at 16:25 hours.

Treatment Scheme

Wastewater flows by gravity and with the aid of 20 lift stations for both Sunland Park and the Santa Teresa WWTP. At the treatment plant a main lift station carries the raw sewage up to the treatment units. The flow is through the entrance works which consists of an automatic bar screen with a manual backup and a grit removal chamber. Solids collected from the bar screen and grit chamber are disposed in the local landfill. The lift station is attached to an alarm system which protects against overflow problems. An additional lift station has been constructed near the Sunland Park North (Santa Teresa) Wastewater Treatment Plant, which is used to transport wastewater to the Sunland Park facility, for treatment.

The wastewater flow then enters the aeration basin. Air is provided by four blowers. Two blowers run continuously while one is resting and these units are alternated on a daily basis. Wastewater flows to two circular final clarifiers from the aeration basin.

Contents of the final clarifier are discharged to the ultraviolet (UV) disinfection unit. The treated water flows through a 12 inch Parshall flume, with a Drexelbrook instantaneous flow meter and totalizer. Samples for NPDES permit monitoring are collected from this unit. The flow is then discharged through an underground pipe to the Rio Grande in Segment 20.6.4.101 NMAC of the Rio Grande Basin.

Return Activated Sludge (RAS) is sent back to the aeration basin from the final clarifiers.

Solids

Waste Activated Sludge (WAS) is pumped to the sludge thickener and then to the four cell aerobic digester. Sludge from the digester is then pumped to the belt filter press. Pressed sludge is placed into a truck to be transported to the local landfill. The belt filter press is operated on a daily basis for approximately 4 hours. Presently the drying beds are used as a backup only for this facility in case the belt filter press goes down. A polymer is added to the sludge as it enters the belt filter press to allow for greater separation of the water and solids. Dried sludge is hauled to the local landfill where it is stockpiled and then mixed with cover dirt for disposal in the landfill. The sludge disposal site is restricted from public access.

Further Explanations

Note: The sections are arranged according to the format of USEPA Form 3560-3 and checklist, attached, rather than being ranked in order of importance.

Permit

Overall Rating For Permit Verification (Satisfactory)

Record Keeping and Reporting

Overall Rating For Record Keeping and Reporting (Satisfactory)

Findings For Recordkeeping and Reporting

1. Records were reviewed for June 2016. The records and reporting problems noted in previous inspections have been addressed by the permittee and their contractor. This is an improvement from the last NMED inspection done November 2014.

2. The EPA is encouraging permittees to transition from submitting DMRs as paper copies to the NetDMR system. Information on the NetDMR training can be found at:

<http://epa.gov/netdmr/about/training.html>

Operations And Maintenance

Overall Rating For Operation and Maintenance (Marginal)

Permit Requirements For Operation And Maintenance

The permit requires in Part III. B.

3. Proper Operations and Maintenance

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner that which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the condition of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings For Operation and Maintenance

1. Repairs and replacements have been made in the last year to the following units: the headworks bar screen & grit removal system; solids wasting, belt press and disposal; Ultra violet disinfection system and over all housekeeping at the facility. There are improvements from previous inspections.
2. Sanitary Sewer Overflows & Collection system, the permittee is making upgrades and doing maintenance on lift stations that have long been neglected. The Racetrack lift station inner walls have been sealed and coated with a protective membrane (Raven Epoxy), pumps are being maintained and the area has been cleaned.
3. Numerous lift station and collection system overflows have occurred in 2016 at loctions including Racetrack Drive (10,000 gal est. on 8/1/2016); Anapara lift station (3,000 gallons est May 24, 2016); North of the treatment plant (15,000 gallons est, May 5, 2016); Sunland Park South (8,000 gallons est. February 21, 2016). There have been at least 12 sewer and lift station overflows so far in 2016. The high number of sewer overflows indicate a more aggressive maintenance program for sewer cleaning, rehabilitation, replacement as well as a need for a more active pretreatment and outreach program for local businesses and residences is necessary.
4. The View Point Lift station at Santa Teresa is still being operated with portable pumps. There was evidence of spillage, oil and debris on the ground. During previous inspections facility representatives stated the portable pumps were temporary. This inspector has observed these pumps onsite for 4 years.
5. The permittee has actively worked to increase the number and training level for facility operators. This is a crucial part of the success of plant operations and an improvement from the previous inspection.
6. The Sunland Park North (old Santa Teresa) WWTP is still serving as a pass through for wastewater to the main treatment plant. There was no observed direct discharge from this facility to the Rio Grande. NMED has received anonymous complaints about the facility condition, smell and pest being attracted to the area from this plant. At the time of this inspection, floating areators were not operating

and the lagoons appeared to contain highly septic anaerobic waste that adds to odor problems. The permittee has plans to proceed with construction of a new facility at this site.

7. Failure of the UV disinfection system resulted in effluent exceedences for E. coli bacter in August 2016. Operators reported the problem to NMED and also made repairs to the system.

8. The metal piping in the aeration basins for both the delivery of air from the blowers and the lines for the wastewater have holes and are damaged from the caustic fumes and nature of the wastewater. Some lines should be replaced.

Self-Monitoring

Overall Rating For Self Monitoring (Satisfactory)

Flow Measurement

Overall Rating For Flow Measurement (Unsatisfactory)

Permit Requirements For Flow Measurements:

The permit requires in Part III C. 6. FLOW MEASUREMENTS:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected, shall be capable of measuring flow with a maximum deviation 10% from true discharge tares throughout the range of expected discharge volumes.

Findings For Flow Measurements

1The staff gauge is loosely attached to the wall and is buckled so that is warped and may not accurately measure the flow at the high volumes. This staff gauge should be replaced.

2. The Drexelbrook flow measurement totalizer device was last calibrated in 2011 according to the lable on the meter. It is suggested calibration be done yearly and checked quaterly against the staff gauge.

Laboratory

Overall Rating For Laboratory (Satisfactory)

Effluent And Receiving Water

Overall Rating For Effluent And Receiving Water (Marginal)

Permit Requirements For Effluent And Receiving Water

The permit requires in Part I Table

Pollutant Characteristics	Discharge Limitations						Monitoring Requirements	
	lbs/day, unless noted			mg/L, unless noted (*3)			Measurement Frequency	Sample Type (*1)
Pollutant	30-Day Avg	7-Day Avg	Daily Max	30-Day Avg	7-Day Avg	Daily Max		
Flow	Report MGD		Report MGD				Daily	Totalizing Meter
BOD Influent (*2)	Report	Report		Report	Report		Once/Week	6- Hour Composite
BOD Effluent (*2)	500	750		30	45		Once/Week	6-Hour Composite
BOD Percent Removal	≥85%						Once/Week	Calculate (*3)
TSS Influent (*2)	Report	Report		Report	Report		Once/Week	6-Hour Composite
TSS Effluent (*2)	500	750		30	45		Once/Week	6-Hour Composite
TSS Percent Removal	≥85%						Once/Week	Calculate (*3)
E. coli (*4)	9.55 x 10 ⁹ cfu/day		Report	126	126	410	5/week	Grab
TRC (*6)						11	Daily	Instantaneous Grab (field measurement) (*5)
Total Boron (*7)	Report		Report	Report		Report	3/week	Grab

Effluent Characteristics		Discharge Limitations			
		Standard Units		Monitoring Requirements	
Pollutant	STORET Code	Minimum	Maximum	Measurement Frequency	Sample Type
pH	00400	6.6	9.0	Daily	Grab

Table 3

Whole Effluent Toxicity Testing (48 Hr. NOEC) (*1)				
Effluent Characteristic	Discharge Monitoring		Monitoring Requirements	
	30-Day Average Min	48-Hr Min	Frequency	Type
Daphnia pulex	Report	Report	Once/Quarter	24-Hr. Composite
Pimephales promelas	Report	Report	Once/Quarter	24-Hr. Composite

Findings for Effluent and Receiving Water

1. Sanitary sewer overflows are unpermitted discharges and are considered in this part of the evaluation for rating purposes. Numerous overflows continue to occur throughout the collection system. See the section above for Operations and Maintenance number 3 for more details.

2. Effluent Exceedences for 2016 were reported on the Discharge Monitoring Reports (DMR) for:
 E. coli bacteria, >20,000 cfu/100ml August 15, 2016
 E.coli bacteria > 20,000 cfu/ 100 ml August 16, 2016
 E. coli bacteria > 20,000 cfu/ 100 ml June, 2016
 Low pH 6.41s.u. January 2016

SLUDGE HANDLING

Overall Rating For Sludge Handling (Satisfactory)

Permit Requirements for Sludge Handling:

The permit requires in Part IV

MAJOR - SEWAGE SLUDGE REQUIREMENTS
 INSTRUCTIONS TO PERMITTEES

Select only those Elements and Sections which apply to your sludge reuse or disposal practice. If your facility utilizes more than one type of disposal or reuse method (for example, Element I and Element II apply) or the quality of your sludge varies (for example, Section II and Section III of Element I apply) use a separate Discharge Monitoring Report (DMR) for each Section that is applicable.

The sludge DMRs shall be due by February 19th of each year and shall cover the previous January through December time period. (The sludge DMRs for permits in Texas shall be due by September 1 of each year, with the reporting period of August 1 to July 31)

Findings for Sludge Handling:

1. The facility is now wasting and processing sludge at an adequate rate to maintain the activated sludge aeration basins and secondary clarifiers. Solids are being tested quarterly based on tonnage and disposed of at the Camino Real Landfill. This is an improvement from the previous inspection (November 2014).

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Google Earth

Date: July 18, 2013

Time: Unknown

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Aerial View of the facility.



Outfall at the Rio Grande

Sunland Park WWTP

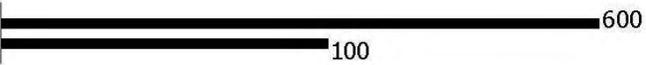
© 2013 Google

© 2013 INEGI

Google earth

Google earth

feet
meters



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:18 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Influent Bar Screen is operational This is an improvement from previous inspections.



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:18 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: - CRRUA Sunland Park Wastewater Treatment Plant

Subject: Grit Hopper area is operational and the area is clear of trash and debris. This is an improvement.



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:26 Hours

City/County: Sunland Park / Dona Ana County

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The Aeration Basins continue to have a lot of foam, though the reduction in solids content has improved operations overall.



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:27 Hours

City/County: Sunland Park / Dona Ana County

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Worn pipes with hole in the distribution lines and in the aeration lines are found through the plant. The caustic nature of sewage has deteriorated plumbing and replacement lines are necessary.



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:35 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The aeration basins are in series and the center basin is the final aeration basin before the wastewater is sent to the secondary clarifiers. This basin had less foam than those earlier in the treatment train.



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:50 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Secondary Clarifiers have some uneven flow over the weirs though no solids were observed going over the weirs. The sludge blanket was 2 – 3 feet, tight and the water above was clear.



MED/SWQB
Official Photograph Log
Photo # 8

Photographer: B. Cooney

Date: September 29, 2016

Time: 11: 59 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Ultraviolet Disinfection and effluent. The light banks were working at the time of the inspection. The effluent was clear as it flowed out of the facility.



NMED/SWQB
Official Photograph Log
Photo # 9

Photographer: B. Cooney

Date: September 29, 2016

Time: 11:11 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: Effluent Staff Gauge at the Parshall Flume is buckling and needs to be replaced.



NMED/SWQB
Official Photograph Log
Photo # 10

Photographer: B. Cooney

Date: September 29, 2016

Time: 12:05 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The Sludge belt press is operational and run daily.



NMED/SWQB
Official Photograph Log
Photo # 11

Photographer: B. Cooney

Date: September 29, 2016

Time: 12:16 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant

Subject: The effluent at the Rio Grande was clear and no floating solids were present.



NMED/SWQB
Official Photograph Log
Photo # 12

Photographer: B. Cooney

Date: September 29, 2016

Time: 12:25 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - Race Track Lift Station

Subject: Race track lift station, rehabilitation and repairs – coating with an epoxy membrane for protection.



NMED/SWQB
Official Photograph Log
Photo # 13

Photographer: B. Cooney

Date: September 29, 2016

Time: 16:05 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - View Point Lift Station

Subject: View Point lift station - Oil and sewage is pooling on the ground.



NMED/SWQB
Official Photograph Log
Photo # 14

Photographer: B. Cooney

Date: September 29, 2016

Time: 16:02 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: CRRUA Sunland Park Wastewater Treatment Plant - View Point Lift Station

Subject: Another perspective of the View Point lift station - Oil and sewage is pooling on the ground.

